

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
Eastern Division (Youngstown)**

Susan Beiersdorfer, <i>et al.</i> ,)	
Plaintiffs,)	
v.)	Case No. 4:19-cv-00260
Frank LaRose, Secretary of State, <i>et al.</i> ,)	Judge Pearson
Defendants.)	

* * * * *

**PLAINTIFFS' MOTION FOR ENLARGEMENT OF TIME TO
RESPOND IN OPPOSITION TO MEDINA COUNTY BOARD OF ELECTIONS'
AND ATHENS/MEIGS COUNTIES' BOARDS OF ELECTIONS'
MOTIONS TO DISMISS**

Now come Plaintiffs Susan Beiersdorfer *et al.*, by and through counsel, and move the Court for leave to respond in opposition to the “Motion to Dismiss of Defendant Athens County and Meigs County Board of Elections” and the “Motion for Judgment on the Pleadings of Defendant Medina County Board of Elections” on or before April 10, 2020.

/s/ Terry J. Lodge
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Memorandum

On March 3, 2020, Defendants Athens and Meigs Counties’ Boards of Elections brought their Motion (Dkt. No. 79), and on March 4, 2020, Medina County Board of Elections filed its

Motion (Dkt. No. 80). Both are potentially dispositive motions and by the Court's local rule and the Case Management Order, Plaintiffs are required to respond by April 2, 2020 as to Athens/Meigs, and April 3, 2020 as to Medina.

This is Plaintiffs' initial request for an extension as to any of these Defendants. Plaintiffs' counsel have worked on the responses, but seek this enlargement of time to complete the needed research and writing. Counsel have also had to respond to litigation requirements in two other federal court and federal agency cases, making it harder to complete responses to the instant Motions.

Plaintiffs' counsel has consulted with counsel for these three Defendants, and the respective attorneys have indicated that they do not oppose Plaintiffs' requests. outstanding requests for dismissal.

WHEREFORE, Plaintiffs pray the Court grant them until April 10, 2020 by which time to respond to Athens/Meigs Boards of Elections' Motion to Dismiss and Medina BOE's .Motion for Judgment on the Pleadings.

/s/ Terry J. Lodge
Terry J. Lodge, Esq.
Co-Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2020, I deposited a copy of the foregoing Motion in the Electronic Case Filing system maintained by the Court, and that according to protocols of the system, it was electronically served upon all counsel registered to receive electronic filings.

/s/ Terry J. Lodge
Terry J. Lodge, Esq.
Co-Counsel for Plaintiffs